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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

X17, INC., a California corporation,
Plaintiffs,

v.

MARIO LAVANDEIRA, dba Perez Hilton,
and DOES 1 through 10, inclusive,
Defendants.

Case No. CV 06-07608 VBF (JCX)

**DECLARATION OF JOHN
TEHRANIAN IN SUPPORT OF
MOTION TO COMPEL**

Hearing Date: 2/12/08
Time: 9:30 a.m.
Courtroom: 20

**Hearing Before Magistrate Jacqueline
Chooljian**

[Notice of Motion and Motion to Compel
Production and [Proposed] Order filed
concurrently herewith]

I, John Tehranian, declare as follows:

1. I am an attorney with the firm Turner Green Afrasiabi & Arledge LLP, counsel of record for Plaintiff X17, Inc. ("X17"). I am licensed to practice before this Court. I have personal knowledge of the facts stated in this declaration and, if called upon to do so, could and would testify competently thereto.

3. To date, it is unclear whether documents related to Lavandeira's advice of counsel defense exist. We have received none. Since we have not yet received any sworn statement that such documents do not exist and, in light of court deadlines, we are bringing this motion to compel.

/s/ John Tehranian